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Attorneys for Defendants
WELLS FARGO & COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A., WACHOVIA
SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL
NETWORK, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JORGE V. RAGDE, JR. AND JENNIFER J.
RAGDE, On Behalf of Themselves and All
Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO & COMPANY, WACHOVIA
MORTGAGE CORPORATION, WACHOVIA
BANK, N.A., WACHOVIA SECURITIES, LLC,
WACHOVIA SECURITIES FINANCIAL
NETWORK, LLC, WACHOVIA
CORPORATION, and DOES 1-10 Inclusive,

Defendants.

Case No. C 09-0226-SI

**STIPULATION AND
~~PROPOSED~~ ORDER FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

WHEREAS, on February 18, 2009, the parties submitted an amended stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to April 2, 2009;

WHEREAS, on March 30, 2009, the parties submitted a second stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to May 4, 2009;

WHEREAS, on April 30, 2009, the parties submitted a third stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to June 8, 2009;

STIP FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Case No. C 09-0226 SI
sf-2721882

1 WHEREAS, on June 4, 2009, the parties submitted a fourth stipulation to extend the
2 defendants' time to respond to plaintiffs' initial complaint to July 8, 2009;

3 WHEREAS, on July 6, 2009, the parties submitted a fifth stipulation to extend the
4 defendants' time to respond to plaintiffs' initial complaint to August 7, 2009;

5 WHEREAS, the Initial Case Management Conference in this matter is currently scheduled
6 for Friday, August 21, 2009 at 2:30 p.m.;

7 WHEREAS, the Parties, through their counsel, have reached an agreement in principle to
8 settle this matter and are in the process of finalizing the settlement documentation;

9 IT IS HEREBY STIPULATED AND AGREED pursuant to Local Rule 6-1(a), and
10 Federal Rule of Civil Procedure 12(a), by and between plaintiffs Jorge V. Ragde, Jr. and Jennifer
11 J. Ragde and defendants Wells Fargo & Company, Wachovia Mortgage Corporation, Wachovia
12 Bank, N.A., Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Wachovia
13 Corporation, through their respective attorneys, that the time by which defendants may plead or
14 otherwise respond to the Complaint shall be extended to and include **Friday, September 4, 2009**.

15 IT IS FURTHER STIPULATED AND AGREED pursuant to Northern District Local
16 Rules 6-2(a), 7-12, and 16-2(e), that the Initial Case Management Conference currently scheduled
17 for **Friday, August 21, 2009** shall be continued to **Friday, September 18, 2009**. All other case
18 management deadlines shall be vacated, pending final resolution of this matter.

1 Dated: August 5, 2009

JEFFREY F. KELLER
KATE SCANLAN
KELLER GROVER LLP.

2 By /s/ Kate Scanlan
3 Kate Scanlan

4 Attorneys for Individual and Representative
5 Plaintiff JORGE V. RAGDE, JR. and JENNIFER
6 J. RAGDE

7 Dated: August 5, 2009

JAMES R. McGUIRE
NATALIE NAUGLE
MORRISON & FOERSTER LLP

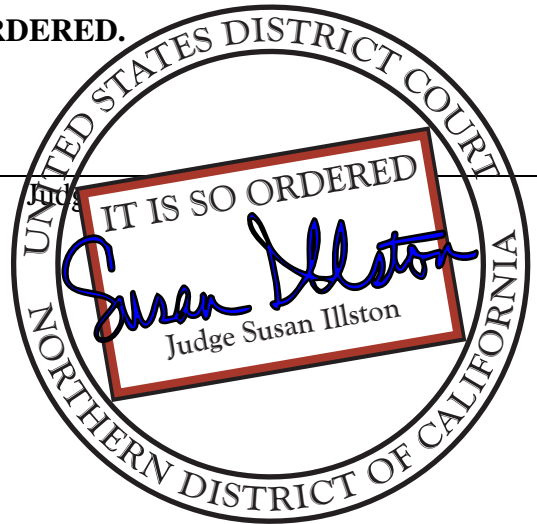
8 By /s/ James R. McGuire
9 James R. McGuire

10 Attorneys for Defendant WELLS FARGO &
11 COMPANY, WACHOVIA MORTGAGE
12 CORPORATION, WACHOVIA BANK, N.A.,
13 WACHOVIA SECURITIES, LLC, WACHOVIA
14 SECURITIES FINANCIAL NETWORK, LLC,
15 WACHOVIA CORPORATION

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Dated: August 5, 2009

18 By:



GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from Kate Scanlan and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

Date: August 5, 2009

By /s/ James R. McGuire

James R. McGuire

Attorneys for Defendant WELLS FARGO &
COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A.,
WACHOVIA SECURITIES, LLC, WACHOVIA
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